

1 DAYLE ELIESON
2 United States Attorney
3 DEBORAH LEE STACHEL
4 Regional Chief Counsel, Region IX
5 Social Security Administration
6 MICHAEL K. MARRIOTT, CSBN 280890
7 Special Assistant United States Attorney
8 160 Spear Street, Suite 800
9 San Francisco, California 94105
10 Telephone: (415) 977-8985
11 Facsimile: (415) 744-0134
12 E-Mail: Michael.Marriott@ssa.gov

8 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

14 ANDREW PERRY,) Case No: 2:18-cv-01192-GMN-VCF
15 Plaintiff)
16 v.)
17 NANCY A. BERRYHILL, Acting) STIPULATION FOR EXTENSION OF
Commissioner of Social Security,) TIME TO FILE DEFENDANT'S CROSS
18 Defendant.) MOTION TO AFFIRM
) (Second Request)
)

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of fourteen days from December 13, 2018 to December 27, 2018, to prepare and file her cross motion to affirm. This is the Commissioner's second request for an extension.

Upon review of the administrative record and Plaintiff's MSJ, Defendant believes that this case may be appropriate for voluntary remand in lieu of further litigation. Defendant respectfully requests this extension of time for the Appeals Council to consider the remand.

On December 14, 2018, Plaintiff's counsel informed Defendant by email that he had no objection to this extension.

Respectfully submitted,

Date: December 14, 2018

ROHLFING & KALAGIAN, LLP

By:

/s/* Marc V. Kalagian

MARC V. KALAGIAN

*authorized by email December 14, 2018

Attorneys for Plaintiff

Date: December 14, 2018

DAYLE ELIESON

United States Attorney

By:

/s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Assistant Regional Counsel

Attorneys for Defendant

Of Counsel

Jeffrey Chen

Assistant Regional Counsel

Social Security Administration

IT IS SO ORDERED.

DATE: 12-14-2018

Carl Gaddis

HONORABLE CAM FERENBACH
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Marc V. Kalagian
Rohlfing & Kalagian, LLP
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: December 14, 2018

DAYLE ELIESON
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant